



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 14, 2016

Kristen B. Knox
Regulatory Affairs Manager
Nisso America Inc.
88 Pine Street, 14th Floor
New York, NY 10005

Subject: PRIA Label Amendment – Submission of companion animal safety study to support application of product to small dogs and puppies
Product Name: RF2213 AE CDSO
EPA Registration Number: 8033-131
Application Date: 02/23/2016
Decision Number: 514257

Dear Ms. Knox:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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Decision No. 514257

with FIFRA section 6. If you have any questions, you may contact Elizabeth Fertich at 703-347-8560 or via email at fertich.elizabeth@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Bacon', with a long horizontal flourish extending to the right.

Laura Bacon
Product Manager 04
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

RF2213 AE CDSO

[Text for "Dog" in the product name must be at least 75% of the size of the largest letter in the Brand Name]

SUBLABEL A – APPLICATOR DEVICE PACKAGE

[Front Panel]

Front panel - For Use Only on Toy/Small (4-9 lbs.), Medium (10-22 lbs.), Large (23-55 lbs.) and Extra Large (56 lbs and over) Dogs/Puppies 10 weeks of age or older and greater than 4 lbs.

[representative picture of dog]

[Flea [Treatment] [and] Control only for Dogs/Puppies 10 weeks of age or older and greater than 4 lbs]

ACTIVE INGREDIENTS:

Etofenprox (CAS # 80844-07-1).....	20.0%
Acetamiprid (CAS# 135410-20-7)	9.5%
Piperonyl Butoxide (CAS # 51-03-6)*	8.0%
S-Methoprene (CAS # 65733-16-6).....	5.0%
OTHER INGREDIENTS:	<u>57.5%</u>
TOTAL	100.0%

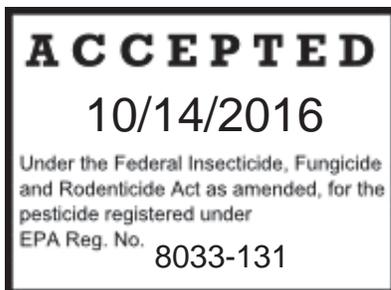
*butylcarbityl (6-propylpiperonyl ether) and related compounds

KEEP OUT OF REACH OF CHILDREN CAUTION

See Back Panel for [Ingredients and] Additional Precautionary Statements

NET CONTENTS: (Number):0.027 fl oz (0.8 cc) Applicator [tube] (Toy/Small Dogs, 4 – 9 lbs.)
0.068 fl oz (2.0 cc) Applicator [tube] (Medium Dogs, 10-22 lbs.)
 0.169 fl oz (5.0 cc) Applicator [tube] (Large Dogs, 23-55 lbs.)
 0.271 fl oz (8.0 cc) Applicator [tube] (Extra Large Dogs 56 lbs
 and over)

EPA Reg. No. 8033-131
EPA Est. No.
Batch/Lot No.



[1.5 x 1.5 cm]

1. DIRECTIONS FOR USE WITH APPLICATOR

RF2213 AE CDSO

DO NOT USE ON DOGS/PUPPIES LESS THAN 10 WEEKS OLD OR LESS THAN 4 LBS. READ ENTIRE LABEL [AND INSERT(S)] BEFORE EACH USE. USE ONLY ON DOGS/PUPPIES. DO NOT USE ON OTHER ANIMALS! DO NOT ALLOW CHILDREN TO APPLY PRODUCT.

INTRODUCTION:

Effective flea control for your dog/puppy.

[RF2213 AE CDSO] kills fleas for up to (28 days)(30 days)(1 month)(4 weeks)(37 days).

The [RF2213 AE CDSO] [brand] [reusable] applicator is specially designed to make applying flea control easier, more precise -- and neater – than before. You simply insert the appropriate [brand] tube [vial][cartridge] for your dog/puppy into the applicator, close it and squeeze to apply. The applicator's ergonomic, contoured shape [design] makes it easy to grip and a built-in fin [tip] [comb] helps to spread [part] the [your] dog's/puppy's hair to allow the liquid to more readily [better] reach [apply] the [to] [your][dog's/puppy's] skin. The tube [vial][cartridge] is sealed inside, so you can be confident that the liquid goes onto your dog/puppy – and not your hand. Plus, if the applicator is laid down on a table, counter or other flat surface, it won't run out or drip.

The RF2213 AE CDSO provides a unique applicator device that allows dog owners to treat their dogs/puppies more securely, and dispose of liquid cartridges [tubes][vials]with less mess.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label. [If you choose to apply directly to dog/puppy without using the applicator device, read the follow the Directions for Use for direct Application to Dogs on this package.]

USE RESTRICTIONS:

Apply this product once every 30 days. Do not use more than one vial [tube][cartridge] per dog/puppy and do not treat more than once per month. Do not get this product in dog's/puppy's eyes or mouth. Do not allow your dog/puppy to ingest this product. Do not apply to dogs/puppies weighing less than 4 lbs (required for smallest size only).

RF2213 AE CDSO works by application directly to the dog's/puppy's skin, not to the hair. When applying, use [the] [brand] applicator device tip to manually push aside dog's/puppy's hair to allow direct application to the skin.

[(Note: Application requires one applicator [tube][cartridge] per dog per application)]

[Note: Each package contains sufficient tubes/applicators for [X] applications]

[bullets may be used instead of numbers]

FOR [TOY/SMALL, 4 – 9 lbs.] [MEDIUM, 10 – 22 lbs.] DOGS/PUPPIES (xxx lbs)

To apply the [RF2213 AE CDSO] treatment, use one disposable liquid cartridge [tube][vial] [for each application] with the applicator device.

1. OPEN [icon]

Use finger scoop to lift open [color, e.g. green] door.

2. LOAD [icon] (2 alternate statements)

-[To Load, place tube [cartridge][vial] white side up into the open applicator with front of tube placed under tab on door]

-[To Load, place tube [cartridge][vial] white side up into the [open] applicator with tip end of tube placed under [color][U-shaped] tab on door]

[Ensure that tube [cartridge][vial] fits securely in the applicator.]

3. CLOSE [icon]

Gently close the [color, e.g. green] door [and] the tube will snap open.

4. APPLY [icon]

The dog/puppy should be standing for easy application. To apply, use [front edge of applicator] [tip] to part hair and get next to dog's/puppy's skin. Press [circle] [[round] thumb pad] on [color-green] door [number-once] at each of three evenly placed spots between the shoulder to the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Do not spread RF2213 AE CDSO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will [over time] distribute the application over the entire dog/puppy, lightly brushing the dog/puppy 12-24 hours after treatment will help to distribute the material over the skin.

5. DISPOSE [icon]

[When finished, hold applicator device over trash.] To dispose of empty tube, open [color, e.g. green] door and drop empty tube into trash or offer for recycling if available. [Close applicator device door and store in original package.]

6. RETREATMENT [REAPPLICATION] (2 Alt. statements)

- [*Do not reapply product for 30 days]

- [*Do not treat more than once per month.]

[Note: Each package contains sufficient cartridges/tubes/vials for [X] applications]

FOR [LARGE, 23 – 55 lbs.][EXTRA LARGE, 56 lbs. and over] DOGS/PUPPIES (xxx lbs)

To apply the [RF2213 AE CDSO] treatment, use one disposable liquid cartridge [tube][vial] [for each application] with the applicator device.

[bullets may be used instead of numbers]

1. OPEN [icon]

Use finger scoop to lift open [color, e.g. green] door.

2. LOAD [icon] (2 alternate statements)

-[To Load, place tube [cartridge][vial] white side up into the open applicator with front of tube placed under tab on door]

-[To Load, place tube [cartridge][vial] white side up into the [open] applicator with tip end of tube placed under [color][U-shaped] tab on door]

[Ensure that tube [cartridge][vial] fits securely in the applicator.]

3. CLOSE [icon]

Gently close the [color, e.g. green] door [and] the tube will snap open.

4. APPLY [icon]

The dog/puppy should be standing for easy application. To apply, use [front edge of applicator][tip] to part hair and get next to dog's/puppy's skin. Press [circle] [[round] thumb pad] on [color][green] door [number-once] at each of [four] (Large dogs) [five] (Extra Large dogs) evenly placed spots between the shoulder to the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Do not spread RF2213 AE CDSO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will [over time] distribute the application over the entire dog/puppy, lightly brushing the dog/puppy 12-24 hours after treatment will help to distribute the material over the skin.

5. DISPOSE [icon]

[When finished, hold applicator device over trash.] To dispose of empty tube, open [color, e.g. green] door and drop empty tube into trash or offer for recycling if available. [Close applicator device door and store in original package.]

6. RETREATMENT [REAPPLICATION] (2 Alt. statements)

- [*Do not reapply product for 30 days]

- [*Do not treat more than once per month.]

[Note: Each package contains sufficient cartridges/tubes/vials for [X] applications]

RF2213 AE CDSO is most effective when used as part of a total flea management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2213 AE CDSO kills fleas.]

[TREATMENT SCHEDULE]			
Dosage: Apply 1 applicator [tube][vial] [every 30 days][monthly] per dog/puppy			
Dog's Name	First [Month][Treatment Date]	Second [Month][Treatment Date] [(30 Days From 1 st)]	Third [Month][Treatment Date] [(30 Days From 2 nd)]

Reminder: I purchased RF2213 AE CDSO from: _____

NOTES: _____

Treatment table can be expanded based on package size. (6 months)]

PESTICIDE STORAGE and CONTAINER HANDLING: Pesticide Storage: Store [tubes][vials][cartridges] together in a cool, dry area away from children and animals. **Pesticide Disposal: If empty:** Do not reuse cartridge [vial] [tube]. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS – CAUTION

HAZARDS TO HUMANS: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Repeated exposure to Etofenprox can cause skin irritation.

HAZARDS TO ANIMALS: DO NOT USE ON DOGS/PUPPIES LESS THAN 10 WEEKS OLD OR LESS THAN 4 LBS. For external use only. Consult a veterinarian before using this product on debilitated, aged, pregnant, or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals. Sensitivities may occur after using ANY pesticide product for pets. Some sensitive dogs/puppies may experience temporary skin irritation such as itching or redness at the application site. If signs of sensitivity occur, bathe your dog/puppy with mild soap and rinse with large amounts of water. If signs persist or become more severe, call 1-800-brand phone number or contact your veterinarian immediately.

FIRST AID	
If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after first 5 minutes, then continue rinsing • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-xxx-xxx-xxxx, 24 hours/day, 7 days/week .	

SIDE EFFECTS: Monitor your dog/puppy after application. Side effects may include signs of skin irritation such as redness, scratching, or other signs of discomfort. If these or other side effects occur, consult your veterinarian or [subregistrant] [brand] at 1-800-brand phone number.



PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

WARRANTY AND CONDITIONS OF SALE:

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

In case of emergency or for product information, call 1-800-xxx-xxxx [or contact your veterinarian if your dog is experiencing an adverse event].

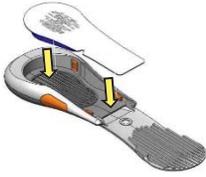
Nippon Soda Co., Ltd.
c/o Nisso America, Inc.
88 Pine St.
New York, NY 10005

[URL]

Alternate Sets of ICONS for the RF2213 AE CDSO

[ICON SET 1]
[OPEN]

[LOAD]



[CLOSE]



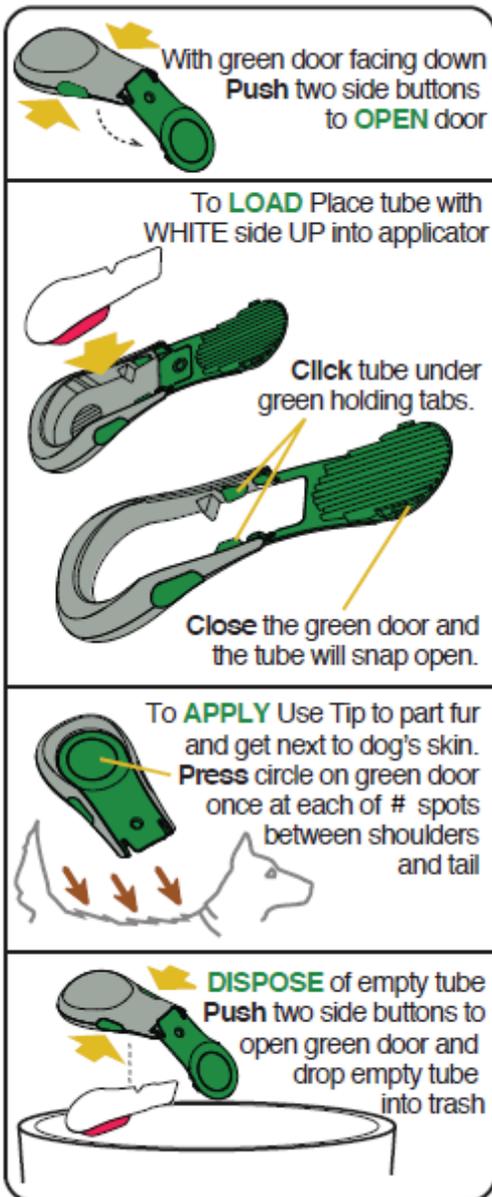
[APPLY]



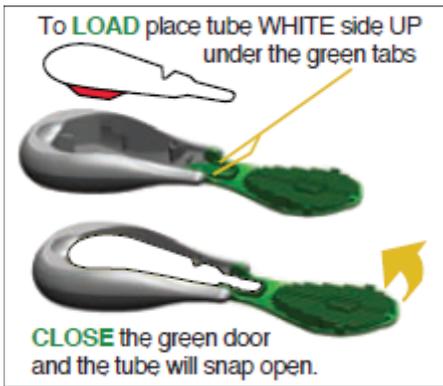
[DISPOSE]



[ICON SET 2] ALTERNATE ICONS FOR DIRECTIONS FOR USE (will be specific to dog's/puppy/s size)



(“#Spots” is a variable dependent on size)
Door color may change based on brand.
(Alternate LOAD icon)



[ICON SET 3] ALTERNATE ICONS FOR DIRECTIONS FOR USE (will be specific to dog's/puppy's size)



("#Spots" is a variable dependent on size)
 Door color may change based on brand.

[2. (Optional) DIRECTIONS FOR USE FOR DIRECT APPLICATION TO DOGS]

[If you choose to apply directly to dog without using the applicator device, read and follow the Directions for Use in this section.]

RF2213 AE CDSO

IMPORTANT! DO NOT USE ON DOGS/PUPPIES LESS THAN 10 WEEKS OLD OR LESS THAN 4 LBS.

**READ ENTIRE LABEL [AND INSERT(S)] BEFORE EACH USE. USE ONLY ON DOGS/PUPPIES. DO NOT USE ON OTHER ANIMALS!
DO NOT ALLOW CHILDREN TO APPLY PRODUCT.**

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label.

USE RESTRICTIONS:

Apply this product once every 30 days. Do not use more than one vial [tube][cartridge] per dog/puppy and do not treat more than once per month. Do not get this product in dog's/puppy's eyes or mouth. Do not allow your dog/puppy to ingest this product. Do not apply to dogs/puppies weighing less than 4 lbs (required for smallest size only).

RF2213 AE CDSO works by application directly to the dog's/puppy's skin, not to the hair. When applying, manually push aside dog's/puppy's hair to allow direct application to the skin.

[(Note: Application requires one vial [tube][cartridge] per animal per application)]

[(Note: Each package contains sufficient vials [tubes][cartridges] for [X] applications)]

[bullets may be used instead of numbers]

FOR [TOY/SMALL, 4 – 9 lbs.]/[MEDIUM, 10 – 22 lbs.] DOGS/PUPPIES (xxx lbs)

1. Bend at perforation and tear off first vial [tube][cartridge].
2. Hold vial [tube][cartridge] [and bend area of plastic at perforation, tear off and discard.] Hold vial [tube][cartridge] upright and snap tip back, away from face and body.
3. The dog/puppy should be standing for easy application. Apply RF2213 AE CDSO evenly to three spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the vial [tube][cartridge] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2213 AE CDSO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will [over time] distribute the application over the entire dog/puppy, lightly brushing the dog/puppy 12 to 24 hours after application will help to distribute the material over the skin.
5. Discard empty vial [tube][cartridge] as described in PESTICIDE STORAGE and CONTAINER HANDLING .
6. Do not treat more than once per month.

[(Note: Each package contains sufficient vial [tube][cartridge] for [X] applications)]

FOR [LARGE, 23 – 55 lbs.][EXTRA LARGE, 56 lbs. and over] DOGS/PUPPIES (xxx lbs)

1. [Bend at perforation and tear off first vial [tube][cartridge].]
2. [Hold vial [tube][cartridge][and bend area of plastic at perforation, tear off and discard.]]
Hold vial [tube][cartridge] upright and snap tip back, away from face and body
3. The dog/puppy should be standing for easy application. Apply RF2213 AE CDSO evenly to [four spots](large dogs)[five spots](extra large dogs) on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the vial [tube][cartridge] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2213 AE CDSO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will [over time] distribute the application over the entire dog/puppy, lightly brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin..
5. Discard empty vial [tube][cartridge] as described in Pesticide Storage and Container Handling.
6. Do not treat more than once per month.

[Note: Each package contains sufficient vial [tube][cartridge] for [X] applications]

[RF2213 AE CDSO is most effective when used as part of a total flea management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.]

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2213 AE CDSO kills fleas.]

[TREATMENT SCHEDULE]			
Dosage: Apply 1 applicator [tube][vial] [every 30 days][monthly] per dog/puppy			
Dog's Name	First [Month][Treatment Date]	Second [Month][Treatment Date] [(30 Days From 1 st)]	Third [Month][Treatment Date] [(30 Days From 2 nd)]

Reminder: I purchased RF2213 AE CDSO from: _____

NOTES: _____

Treatment table can be expanded based on package size. (6 months)]

PESTICIDE STORAGE and CONTAINER HANDLING: Pesticide Storage: Store [tubes][vials][cartridges] together in a cool, dry area away from children and animals. **Pesticide Disposal: If empty:** Do not reuse cartridge [vial] [tube]. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION

HAZARDS TO HUMANS: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Repeated exposure to Etofenprox can cause skin irritation.

HAZARDS TO ANIMALS: DO NOT USE ON DOGS/PUPPIES LESS THAN 10 WEEKS OLD OR LESS THAN 4 LBS. For external use only. Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals. Sensitivities may occur after using ANY pesticide product for pets. Some sensitive dogs/puppies may experience temporary skin irritation such as itching or redness at the application site. If signs of sensitivity occur, bathe your dog/puppy with mild soap and rinse with large amounts of water. If signs persist or become more severe, call 1-800-brand phone number or contact your veterinarian.

FIRST AID

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

If in eyes

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after first 5 minutes, then continue rinsing
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-xxx-xxx-xxxx, 24 hours/day, 7 days/week .

SIDE EFFECTS: Monitor your dog/puppy after application. Side effects may include signs of skin irritation such as redness, scratching, or other signs of discomfort. If these or other side effects occur, consult your veterinarian or [subregistrant] [brand] at 1-800-brand phone number.



PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

SUB-LABEL B FOR REFILL PACKAGE

(For use with applicator device or direct application to dogs without applicator device)

(Front Panel)

[Product Name]

[Text for "Dog" in the product name must be at least 75% of the size of the largest letter in the Brand Name]

Front panel - For Use Only on Toy/Small (4-9 lbs.), Medium (10-22 lbs.), Large (23-55 lbs.) and Extra Large (56 lbs and over) Dogs/Puppies 10 weeks of age or older and greater than 4 lbs.

[representative picture of dog]

[Flea [Treatment] [and] Control only for Dogs/Puppies 10 weeks of age or older and greater than 4 lbs.]

ACTIVE INGREDIENTS:

Etofenprox (CAS # 80844-07-1).....	20.0%
Acetamiprid (CAS# 135410-20-7)	9.5%
Piperonyl Butoxide (CAS # 51-03-6)*	8.0%
S-Methoprene (CAS # 65733-16-6).....	5.0%
OTHER INGREDIENTS:	57.5%
TOTAL	100.0%

*(butyl carbityl) (6-propylpiperonyl ether) and related compounds

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Back Panel for [Ingredients and] Additional Precautionary Statements

EPA Reg. No. 8033-131
EPA Est No.
Batch/Lot No.

NET CONTENTS: (Number): 0.027 fl oz (0.8 cc) Applicator [tube] (Toy/Small Dogs, 4 – 9 lbs.)
.....0.068 fl oz (2.0 cc) Applicator [tube] (Medium Dogs, 10-22 lbs.)
..... 0.169 fl oz (5.0 cc) Applicator [tube] (Large Dogs, 23-55 lbs.)
..... 0.271 fl oz (8.0 cc) Applicator [tube] (Extra Large Dogs, 56 lbs.
and over)



[1.5 x 1.5 cm]

[Back Panel]

IMPORTANT! DO NOT USE ON DOGS/PUPPIES LESS THAN 10 WEEKS OLD OR LESS THAN 4 LBS.

READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS/PUPPIES. DO NOT USE ON OTHER ANIMALS! DO NOT ALLOW CHILDREN TO APPLY PRODUCT.

Effective flea control for your dog/puppy.

[RF2213 AE CDSO] kills fleas for up to [28 days][30 days][1 month][4 weeks][37 days].

[The [RF2213 AE CDSO] [brand][reusable] applicator is specially designed to make applying flea control easier, more precise -- and neater -- than before. You simply insert the appropriate [brand] tube [vial][cartridge] for your dog/puppy into the applicator, close it and squeeze to apply. The applicator's ergonomic, contoured shape [design] makes it easy to grip and a built-in fin [tip] [comb] helps to spread [part] the [your] dog's/puppy's hair to allow the liquid to more readily [better] reach [apply] the [to] [your][dog's/puppy's] skin. The tube [vial][cartridge] is sealed inside, so you can be confident that the liquid goes onto your dog/puppy -- and not your hand. Plus, if the applicator is laid down on a table, counter or other flat surface, it won't run out or drip.]

[Note: full directions for use to be used if space allows]

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label.

[To apply the RF2213 AE CDSO treatment with the [Brand Name] applicator, use one disposable liquid cartridge [tube][vial][for each application] with the applicator device.]

[Remove one refill tube [cartridge][vial] from the package and insert into opened [brand name] applicator device. Make application according to label directions supplied with the [brand name] applicator device.] If you need directions for application, please call 1-800-XXX-XXXX.

[However, if you choose to apply directly to dog/puppy without using the applicator device, read and follow the Directions for Use For Direct Application to Dogs on this package.]

(DIRECTIONS FOR USE FOR DIRECT APPLICATION TO DOGS)

USE RESTRICTIONS:

Apply this product once every 30 days. Do not use more than one vial [tube][cartridge] per dog/puppy and do not treat more than once per month. Do not get this product in dog's/puppy's eyes or mouth. Do not allow your dog/puppy to ingest this product. Do not apply to dogs/puppies weighing less than 4 lbs (required for smallest size only).

RF2213 AE CDSO works by application directly to the dog's/puppy's skin, not to the hair. When applying, manually push aside dog's/puppy's hair to allow direct application to the skin.

[(Note: Application requires one vial [tube][cartridge] per animal per application)]

[Note: Each package contains sufficient vials [tubes][cartridges] for [X] applications]

[bullets may be used instead of numbers]

FOR [TOY/SMALL, 4 – 9 lbs.]/[MEDIUM, 10 – 22 lbs.] DOGS/PUPPIES (xxx lbs)

1. [Bend at perforation and tear off first vial [tube][cartridge].]
2. [Hold vial [tube][cartridge] [and bend area of plastic at perforation, tear off and discard.]]
Hold vial [tube][cartridge] upright and snap tip back, away from face and body.
3. The dog should be standing for easy application. Apply RF2213 AE CDSO evenly to three spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the vial [tube][cartridge] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2213 AE CDSO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will [over time] distribute the application over the entire dog/puppy, lightly brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin.
5. Discard empty vial [tube][cartridge] as described in Pesticide Storage and Container Handling
6. . Do not treat more than once per month.

[Note: Each package contains sufficient vial [tube][cartridge] for [X] applications]

FOR [LARGE, 23 – 55 lbs.][EXTRA LARGE, 56 lbs. and over] DOGS/PUPPIES (xxx lbs)

1. [Bend at perforation and tear off first vial [tube][cartridge].]
2. [Hold vial [tube][cartridge][and bend area of plastic at perforation, tear off and discard.]]
Hold vial [tube][cartridge] upright and snap tip back, away from face and body
3. The dog/puppy should be standing for easy application. Apply RF2213 AE CDSO evenly to [four spots](large dogs)[five spots](extra large dogs) on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the vial [tube][cartridge] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2213 AE CDSO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will [over time]distribute the application over the entire dog/puppy, lightly brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin..
5. Discard empty vial [tube][cartridge] as described in Pesticide Storage and Container Handling
6. Do not treat more than once per month.

DIRECTIONS FOR USE WITH [Brand Name] APPLICATOR

DO NOT USE ON DOGS/PUPPIES LESS THAN 10 WEEKS OLD OR LESS THAN 4 LBS.

READ ENTIRE LABEL [AND INSERT(S)] BEFORE EACH USE. USE ONLY ON DOGS/PUPPIES. DO NOT USE ON OTHER ANIMALS!

DO NOT ALLOW CHILDREN TO APPLY PRODUCT.

[See inside carton for Directions for Use with [brand name] applicator.]

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label. [If you choose to apply directly to dog/puppy without using the applicator device, read the follow the Directions for Use for direct Application to Dogs on this package.]

USE RESTRICTIONS:

Apply this product once every 30 days. Do not use more than one vial [tube][cartridge] per dog/puppy and do not treat more than once per month. Do not get this product in dog's/puppy's eyes or mouth. Do not allow your dog/puppy to ingest this product. Do not apply to dogs/puppies weighing less than 4 lbs (required for smallest size only).

RF2213 AE CDSO works by application directly to the dog's/puppy's skin, not to the hair. When applying, use [the] [brand] applicator device tip to manually push aside dog's/puppy's hair to allow direct application to the skin.

[(Note: Application assumes one applicator [tube][cartridge] per dog per application)]

[Note: Each package contains sufficient tubes/applicators for [X] applications]

[bullets may be used instead of numbers]

FOR [TOY/SMALL, 4 – 9 lbs.]/[MEDIUM, 10 – 22 lbs.] DOGS/PUPPIES (xxx lbs)

To apply the [RF2213 AE CDSO] treatment, use one disposable liquid cartridge [tube][vial] [for each application] with the applicator device.

1. OPEN [icon]

Use finger scoop to lift open [color, e.g. green] door.

2. LOAD [icon] (2 alternate statements)

-[To Load, place tube [cartridge][vial] white side up into the open applicator with front of tube placed under tab on door]

-[To Load, place tube [cartridge][vial] white side up into the [open] applicator with tip end of tube placed under [color][U-shaped] tab on door]

[Ensure that tube [cartridge][vial] fits securely in the applicator.]

3. CLOSE [icon]

Gently close the [color, e.g. green] door [and] the tube will snap open.

4. APPLY [icon]

The dog/puppy should be standing for easy application. To apply, use [front edge of applicator] [tip] to part hair and get next to dog's/puppy's skin. Press [circle] [[round] thumb pad] on [color-green] door [number-once] at each of three evenly placed spots between the shoulder to the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Do not spread RF2213 AE CDSO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will [over time] distribute the application over the entire dog/puppy, lightly brushing the dog/puppy 12-24 hours after treatment will help to distribute the material over the skin.

5. DISPOSE [icon]

[When finished, hold applicator device over trash.] To dispose of empty tube, open [color, e.g. green] door and drop empty tube into trash or offer for recycling if available. [Close applicator device door and store in original package.]

6. RETREATMENT [REAPPLICATION] (2 Alt. statements)

- [*Do not reapply product for 30 days]

- [*Do not treat more than once per month.]

[Note: Each package contains sufficient cartridges/tubes/vials for [X] applications]

FOR [LARGE, 23 – 55 lbs.][EXTRA LARGE, 56 lbs. and over] DOGS/PUPPIES (xxx lbs)

To apply the [RF2213 AE CDSO] treatment, use one disposable liquid cartridge [tube][vial] [for each application] with the applicator device.

[bullets may be used instead of numbers]

1. OPEN [icon]

Use finger scoop to lift open [color, e.g. green] door.

2. LOAD [icon] (2 alternate statements)

-[To Load, place tube [cartridge][vial] white side up into the open applicator with front of tube placed under tab on door]

-[To Load, place tube [cartridge][vial] white side up into the [open] applicator with tip end of tube placed under [color][U-shaped] tab on door]

[Ensure that tube [cartridge][vial] fits securely in the applicator.]

3. CLOSE [icon]

Gently close the [color, e.g. green] door [and] the tube will snap open.

4. APPLY [icon]

The dog/puppy should be standing for easy application. To apply, use [front edge of applicator][tip] to part hair and get next to dog's/puppy's skin. Press [circle] [[round] thumb pad] on [color][green] door [number-once] at each of [four] (Large dogs) [five] (Extra Large dogs) evenly placed spots between the shoulder to the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Do not spread RF2213 AE CDSO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will [over time] distribute the application over the entire dog/puppy, lightly brushing the dog/puppy 12-24 hours after treatment will help to distribute the material over the skin.

5. DISPOSE [icon]

[When finished, hold applicator device over trash.] To dispose of empty tube, open [color, e.g. green] door and drop empty tube into trash or offer for recycling if available. [Close applicator device door and store in original package.]

6. RETREATMENT [REAPPLICATION] (2 Alt. statements)

- [*Do not reapply product for 30 days]

- [*Do not treat more than once per month.]

[Note: Each package contains sufficient cartridges/tubes/vials for [X] applications]

RF2213 AE CDSO is most effective when used as part of a total flea management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2213 AE CDSO kills fleas.]

[TREATMENT SCHEDULE]			
Dosage: Apply 1 applicator [tube][vial] [every 30 days][monthly] per dog/puppy			
Dog's Name	First [Month][Treatment Date]	Second [Month][Treatment Date] [(30 Days From 1 st)]	Third [Month][Treatment Date] [(30 Days From 2 nd)]

Reminder: I purchased RF2213 AE CDSO from: _____

NOTES: _____

Treatment table can be expanded based on package size. (6 months)]

PESTICIDE STORAGE and CONTAINER HANDLING: Pesticide Storage: Store [tubes][vials][cartridges] together in a cool, dry area away from children and animals. **Pesticide Disposal: If empty:** Do not reuse cartridge [vial] [tube]. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS – CAUTION

HAZARDS TO HUMANS: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Repeated exposure to Etofenprox can cause skin irritation.

HAZARDS TO ANIMALS: DO NOT USE ON DOGS/PUPPIES LESS THAN 10 WEEKS OLD OR LESS THAN 4 LBS. For external use only. Consult a veterinarian before using this product on debilitated, aged, pregnant, or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals. Sensitivities may occur after using ANY pesticide product for pets. Some sensitive dogs/puppies may experience temporary skin irritation such as itching or redness at the application site. If signs of sensitivity occur, bathe your dog/puppy with mild soap and rinse with large amounts of water. If signs persist or become more severe, call 1-800-brand phone number or contact your veterinarian immediately.

FIRST AID	
If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after first 5 minutes, then continue rinsing • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-xxx-xxx-xxxx, 24 hours/day, 7 days/week .	

SIDE EFFECTS: Monitor your dog/puppy after application. Side effects may include signs of skin irritation such as redness, scratching, or other signs of discomfort. If these or other side effects occur, consult your veterinarian or [subregistrant] [brand] at 1-800-brand phone number.



PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

WARRANTY AND CONDITIONS OF SALE:

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

In case of emergency or for product information, call 1-800-xxx-xxxx [or contact your veterinarian if your pet is experiencing an adverse event].

Nippon Soda Co., Ltd.
c/o Nisso America, Inc.
88 Pine St.
New York, NY 10005
[URL]

TEXT FOR INDIVIDUAL APPLICATOR

Product name

For Use Only on Toy/Small (4-9 lbs.), Medium (10-22 lbs.), Large (23-55 lbs.) and Extra Large (56 lbs and over) Dogs 10 weeks of Age or Older and greater than 4 lbs.

Etofenprox 20%, Acetamiprid 9.5%, Piperonyl Butoxide 8%, S-Methoprene 5%,

KEEP OUT OF REACH OF CHILDREN

CAUTION

READ DIRECTIONS BEFORE USING

EPA Reg No. 8033-131

Net Contents

Batch/Lot No.



**DO NOT USE
ON CATS**

OPTIONAL TEXT FOR PACKAGE INSERTS
OPTIONAL INSERT 1

Dear Valued [Store Customer],

Thank you for your purchase of [Product Name]. [Brand] wants the best for your dog/puppy, and we are pleased to share with you some great tips on using the product for the best results.

- A. The [Product Name] comes in 4 different sizes so that the right amount of flea protection is applied to your size dog/puppy. Weigh your dog/puppy before applying [Product Name] and be sure that the product you purchased is the right size for your dog/puppy. Do not apply this product to dogs/puppies younger than 10 weeks or less than 4 lbs. If you have questions, please call 1-800-brand phone number to talk to a product specialist.
- B. For best results, apply [Product Name] evenly to the dog's/puppy's back in spots starting at the top of the back from the shoulders to the base of the tail. Use three spots for toy/small and medium dogs/puppies, 4 spots for large dogs/puppies, and up to 5 spots could be used for extra large dogs/puppies. At each spot, be sure to apply the product to your dog's/puppy's skin, not to the surface of your dog's/puppy's hair coat. For complete instructions on application, please read the package label.
- C. Sensitivities may occur after the use of any topically applied product. A dog's/puppy's skin is a complex organ, and your dog's/puppy's skin may be generally sensitive to topical products. Monitor your dog/puppy after application, and if you have questions about best results or if your dog/puppy experiences a reaction after application, please call 1-800-brand phone number to talk to a product specialist.
- D. When applying [Product Name] make sure not to get this product in your dog's/puppy's eyes or mouth. If you are concerned that your dog/puppy may have an oral exposure to [Product Name] please call 1-800-brand phone number to talk to a product specialist.
- E. In households with dogs and cats, the cat will often groom the dog/puppy as well as itself. Separate treated dogs/puppies from cats for 24 hours after treatment to minimize [reduce potential] oral exposure to your cat.
- F. Treatment of fleas on your dog/puppy does not address the 95-99% of the flea population that lives in your house and yard. So even after your dog/puppy is treated with [Product Name] and adult fleas are killed, flea eggs may continue to hatch in your home for up to two months. For best results, treat your yard and home for fleas with treatments that contain an Insect Growth Regulator, which kills flea eggs.

OPTIONAL INSERT 2

STOP. Please read this insert/card and the entire instructions before using this product.

[Brand Name] wants the best for your dog, and we are pleased to share with you some great tips for using the product.

- Use [Product Name] only as directed.
- For best results, lightly brush your dog's/puppy's coat 24 hours after application.
- Apply away from furniture and carpeting.
- Consult a veterinarian before using if your dog is aged, pregnant, nursing, or taking other medication.

[Contact a product specialist at 1-800-brand phone number with any questions.]

(APPENDIX: PRODUCT SPECIFIC EFFICACY CLAIMS)

Effective on indoor and outdoor dogs/puppies

MARKETING CLAIMS AND OTHER OPTIONAL STATEMENTS

Kills Flea Larvae [(1 month)(30 days)

Protection against fleas for (more than 30 days)(up to 37 days)

Flea protection lasts up to 37 days

Kills Fleas [that (can)(may) transmit tapeworm] (for) (28 days) (30 days) (1 month) (4 weeks) (37 days) (on dogs [puppies])

Kills fleas that may cause flea allergy dermatitis (FAD) (flea bite anemia)(tapeworms)(Bubonic plague)(and)(Rickettsiosis) (for) (28 days) (30 days) (1 month) (4 weeks) (37 days) (on dogs [puppies])

Indicated for the treatment and control of adult fleas and flea larvae in dogs [puppies] 10 weeks of age and older and greater than 4 lbs

Protection against fleas guaranteed or your money back

Kills fleas and flea larvae

Triple action formula to (kill)(provide protection from) fleas (to keep your dog [puppy] protected)(for 30 days)

Triple action formula works to (effectively) kill fleas (and)(to)(provide) protection (that) lasts for a full 30 days [up to 37 days]

Kills fleas without your dog [puppy] being bitten, [unlike oral tablets][flea pills][where fleas have to bite][your dog [puppy]][to die]

Unlike [flea pills][oral tablets], works without bugs biting your dog [puppy]

Oral tablets only kill fleas after your dog [puppy]is bitten

Unlike flea pills, our product kills fleas without your dog [puppy] being bitten

Options to replace all kill statements above

Protects against

Defends against

Guards against

To help minimize the likelihood of flea re-infestation, it is important to treat all pets within the household with an approved flea control product

An important step in breaking the flea life cycle

***(S)-Methoprene (Must occur on same panel wherever InfestStop™ is used)**

Triple action formula kills fleas

Once a month (Monthly) Flea (Prevention) (Treatment) (Control) (Solution)

(28 day) (30 day) (1 month) (4 weeks) Flea (Prevention) (Treatment) (Control)

(Solution)

No mess!

Stays on and doesn't rub off

Spreads with dog's [puppy's] skin oils

[Brand] works with the biology of your dog [puppy][by spreading through the oils of your dog's [puppy's] skin]
Long lasting [formula] [and broad-spectrum efficacy against fleas for up to 37 days]
Effective and convenient [topical][Spot On®] treatment
Easy [topical][Spot On®] [Brand] [Smart Shield™] [reusable]applicator
Triple Active formula contains two adulticides

NON-PESTICIDE RELATED CLAIMS AND OTHER OPTIONAL TEXT

([1][3][4][6] monthly treatments) [1][3][4][6] Months Supply [24][48] doses
1st/2nd/3rd/(Xth dose)
First/second/third (Xth month)
X-pack/X-tubes
[Value][Bonus] pack
X month supply/X monthly treatment(s)
Includes (Brand) (Convenient) (easy to use) [Brand] [Smart Shield™] applicator
Easy (simple) to use (handle) (apply)
[brand] More life in their years
Free [reusable][Brand][Smart Shield™] applicator
Made in the USA

[Brand] [Smart Shield™] Applicator Claims

[Brand] [Smart Shield™] [reusable] applicator easily gets through [penetrates] dog's [puppy's] fur, [for on-skin application][to minimize (oily) residue]
[Brand] [Smart Shield™] [reusable] applicator glides [smoothly] through the dog's [puppy's] fur
[Brand] [Smart Shield™][reusable] applicator features [rounded edges for on-skin application][an angled tip to help guide the application]
Direct to your dog's [puppy's] skin
To help remind you when you last applied treatment, simply write in the date when each dose is applied:
contemporary design
[reusable] [brand name] [Smart Shield™] [Applicator] helps to prevent getting liquid on [your] hands
Helps keep liquid off hands
Helps part hair
[reusable] [brand name] [Smart Shield™] [Applicator] tip parts hair to help [liquid][application] get down to [the][your][dog's] [puppy's] skin
Ergonomically contoured [ergonomic][shape][design] for easy handling [ease of use] [easy use]
For use with [only][brand name][disposable][liquid dispensing] tubes [pods] [vials] [cartridges]
[reusable] [brand name] [Smart Shield™] [applicator][has][provides][allows for][delivers] better grip
[reusable] [brand name][provides] re-closable [re-sealable] packaging for [easy] storage
Closing [reusable] [the][brand name] [Smart Shield™] [applicator] door automatically opens the [disposable][liquid dispensing] tube [pod][vial][cartridge]
[reusable] [brand name] [Smart Shield™] [Applicator] [will not drip after opening]
[reusable] [brand name] [Smart Shield™] [Applicator] Won't drip when set down as you go fetch the [your] dog [puppy]
Includes [unique][reusable] [brand] [Smart Shield™] applicator
[Directs][Puts] the liquid on [to] your dog [pupyp] – [not your hands][away from your hands]
Helps keep liquid off hands
Helps part fur
[reusable] [Brand] [Smart Shield™] [reusable] [Applicator] provides a [more confident][secure] application
Applies liquid to your dog's [puppy's] skin – not yours
Helps prevent applying the wrong spot-on [dose] [product] on [to] the wrong pet
[Introducing] Convenient, easy to use [ACCU-TIP] [Brand] [Smart Shield™] [Applicator] [DISPENSER]
[Easy to use] Longer [reusable] [Brand] [Smart Shield™] applicator tip for easy application to long-haired dogs
[reusable] [Brand] [Smart Shield™] Applicator patent pending

Thermoform claims

[disposable][liquid dispensing] tube [cartridge][vial][pod]
(Note tube/vial/cartridge/pod used interchangeably)
[brand name][disposable][liquid dispensing] [tube][vial][pod] tip [helps][to] spread out liquid [on your][dog][puppy]
Unique [cartridge] [tube][vial][pod] with flow control
[no drip][no mess][application][tube][cartridge][vial][pod]

Promotional Package Copy

One month [dose] free
One free month supply [dose] included
Bonus pack
Free [reusable] [brand] [Smart Shield™] [applicator][tube][vial][cartridge][pod][inside]
Designed not to drip when set on top of the counter, or table, or other flat surface.
For use with [reusable] [brand] [Smart Shield™] applicator
[reusable] [Brand][Smart Shield™] Applicator [device] not included
[brand] Refill Pack [brand] [Smart Shield™] [reusable] [applicator [device] not included]
Free [reusable] [brand][Smart Shield] applicator
[\$x] coupons Save [\$x]
[\$X][X%] [off][savings]
[X] [applicator][tube][vial][cartridge][pod][inside]
Scan [QRcode][here] to learn more
Scan [QRcode][here] [for] [to sign up for] [our newsletter] [special offers] [promotions] [coupons] [more information][FAQ's] [helpful tips] [product tips] [monthly reminder][program]
Visit [website URL] [for] [to sign up for] [our newsletter] [special offers] [promotions] [coupons] [more information][FAQ's] [helpful tips] [product tips] [monthly reminder][program]
Win [a free] [prize] [by entering] [at website URL] [visit website URL] [see official rules] [no purchase necessary]
For official rules visit [website URL]
Game piece inside
Enter to win
Buy one [product x] get one [product x] [free][X%] [\$x] [off]
X [%] [more] [months] [supply] [doses] [tubes] [of protection] [free]

Refill Claims

For use [only] with [reusable] [brand name] [Smart Shield™] [Applicator]
Easy to use [convenient] refills
[Can be used with] [Use with] [reusable] [Brand Name][Smart Shield™] applicator
[reusable] [Brand Name (e.g., Adams or Bio Spot, Smart Shield)] [Applicator] [Refills][Refill Pack]
[Refill Pack] [for] [reusable] [Brand Name] [Smart Shield™] Applicator
[tube][cartridge][vial][pod] refill pack [refills]
Refills [Refill Pack] available
[refill][tube][cartridge][vial][pod] design
Optional [reusable] applicator sold separately

Applicator name options (applicator device is used in text)

Applicator/Tool/Device/Applicator Device/Application Tool

Thermoform name options (tube, cartridge and vial are used in the text)

Amoule/Cartridge/Package/Pod/Refill/Tube/Vial